

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GLENN S. BATES, Plaintiff)	
v.)	C.A. NO. 05-10489-MEL
CHRISTOPHER KENDER and BARRY MITCHELL Defendants)	

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

Plaintiff Glenn S. Bates hereby requests the following voir dire questions per the Court's December 10, 2007 Order:

- (1) Please provide the name of all towns or cities in which you have lived for the past ten years.
- (2) Please state the name of all employers you have had for the past ten years.
- (3) Please state your entire educational background.
- (4) Please state your marital status.
- (5) Please state the name of all employers of your spouse for the past ten years.
- (6) Do you, your spouse, any family members or close friends now work for any law enforcement department or agency.
- (7) Have you worked at any time for any law enforcement department or agency.
- (8) Has your spouse, any family members or close friends ever worked for any law enforcement department or agency.

- (9) Are you more likely to believe the testimony of a police officer rather than a civilian because of the position he or she holds?
- (10) Have you or your spouse ever been involved in a lawsuit? If yes, please specify the type of lawsuit and whether you were a plaintiff or defendant.
- (11) Do you, your spouse, any family members or close friends now work for any court or governmental agency? If yes, please specify.
- (12) Do you have any bias towards plaintiffs in civil lawsuits?
- (13) Have you been exposed to any of the parties or claims in this matter through the media?

Respectfully submitted,

PLAINTIFF GLENN S. BATES,

By his attorney,

/s/ Timothy J. Perry

Timothy J. Perry (BBO #631397)
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Certificate Regarding Service

I hereby certify that this document was served upon all counsel of record by the Court's ECF system.

Date: February 13, 2008

/s/ Timothy J. Perry
Timothy J. Perry